

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Case No. 21-21177-GLT
	)	
LaVonne Clanagan	)	Chapter 13
Debtor	)	
	)	Doc. No.:
	)	
LaVonne Clanagan	)	
Movant	)	
	)	
v.	)	
	)	
HSBC Bank USA, N.A. and	)	
Ronda J. Winnecour, Trustee	)	
Respondent	)	

**DECLARATION**

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to r: HSBC Bank USA, N.A.'s Notice of Mortgage Payment Change dated April 22, 2022, the Debtor's current escrow payment for account number ending in **0689** is **\$32.11**. The new escrow payment is **\$63.07**. The new total mortgage payment is **\$500.07** effective June 1, 2022. The Debtor will make the escrow shortage of **\$30.96** in addition to her regular monthly Chapter 13 plan payment.

Dated: May 15, 2022

Respectfully submitted by:

/s/ LaVonne Clanagan  
LaVonne Clanagan

Dated: May 15, 2022

Respectfully submitted by:  
/s/ Albert G. Reese, Jr., Esquire  
Albert G. Reese, Jr., Esquire  
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